

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Sharne' Louise Niblack

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Richland county dss (Department of Social Service)
Richland County police department

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

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2016 MAY 23 PM 4:32

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sharne' Louise Niblock</u>
Street Address	<u>105 mckenzie st</u>
City and County	<u>eastover</u>
State and Zip Code	<u>Southcarolina 29044</u>
Telephone Number	<u>803 216-4385</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>State of South Carolina</u>
Job or Title (if known)	<u>Richland County Police department</u>
Street Address	<u>5623 Two notch rd</u>
City and County	<u>Columbia, richland</u>
State and Zip Code	<u>South carolina 29204</u>
Telephone Number	<u>1803-576-3000</u>

Defendant No. 2

Name	<u>State of South Carolina</u>
Job or Title (if known)	<u>Richland County Social Services</u>
Street Address	<u>3220 Two Notch Rd</u>
City and County	<u>columbia, richland</u>
State and Zip Code	<u>South carolina 29204</u>
Telephone Number	<u>1803-714-7300</u>

Defendant No. 3

Name	<u></u>
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Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 Defendant No. 4
 Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

U.S.C.A. Amend 14, § 4 ; U.S.C.A. Amend 1, art. 4 ;
U.S.C.A. Amend. 14, § 2, art. 14 ; U.S.C.A. amend, 14, § 2,
art. 29

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Shane' Louise Niblock, is a citizen of the State of (name) South Carolina.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Richland county Department of Social Services, is incorporated under the laws of the State of (name) South Carolina, and has its principal place of business in the State of (name) South Carolina. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

13 million dollars for pain, suffering, and
anguish bestowed upon me by the
separation of my family unlawfully, child
custody

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attached

III. Statement of Claim

1. Richland county police officer deputy Perry took into emergency protective custody minor children Jordan and Javon McCombs on February 26, 2015 at the Richland county dss office on 3220 two notch rd. Officer Deputy Perry claimed that the plaintiff sharne' niblock abandoned the minor infants. Deputy Perry proceeded to seize the minors with no proof of abandonment or charge of abandonment to the plaintiff.
2. February 26, 2015 Richland county department of social services unjustly put minor children Javon and Jordan mcombs in foster care with no proof of abandonment or abuse or neglect.
3. After four days in foster care the minor children were transferred to the fraternal grandmother against plaintiffs request for the children to return home.
4. Richland county dss failed to schedule a trial as requested by the plaintiff at probable cause on February 27, 2015.
5. Richland county dss failed to remove attorney deion oneal esquire as requested and motioned by the defendant after the motion was ordered my judge holt on August 27, 2015.
6. The department of social service failed to serve the plaintiff for the custody court date of September 10, 2015.
7. Full Custody was ordered by judge holt to the paternal father on September 10, 2015 where the maternal mother was not served nor present for the hearing and the children last names was ordered to be changed from niblock to mcombs.

IV. Relief

The plaintiff is asking to be awarded 5 million dollars from State or South Carolina Richland county dss due to the unlawful emergency custody protective placed on her infants during the above case. Due to the emotional distress endured the infants and the plaintiff and the time spent separated.

The plaintiff is asking to be awarded 8 million for the violation of constitutional rights in above case. Due to the violation cited above the plaintiff has not been able to see the infants or have full parental responsibilities. The infants have experienced separation anxiety and this is still an ongoing factor due for remedy.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 23, 2016

Signature of Plaintiff

Printed Name of Plaintiff

Sharon B. Niblock
Sharon' Louis Niblock

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____